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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

7 -oOo-

8 UNITED STATES OF AMERICA,  
9 Plaintiff,  
10 vs.  
11 ROBERT BROWN,  
12 Defendant.

2:15-cr-00053-LRH-VCF

STIPULATION TO CONTINUE  
DEADLINE FOR GOVERNMENT'S  
RESPONSE TO DEFENDANT'S MOTION  
TO SUPPRESS (Doc #18)

(First Request)

13 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United  
14 States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the United  
15 States of America, and Rachel Korenblat, counsel for Defendant ROBERT BROWN, that the  
16 deadline for Government's Response to Defendant's Motion to Suppress, currently set for June 17,  
17 2015, Doc. #17, be vacated and continued for seven (7) days, until June 24, 2015, or to a date to be  
18 set at the Court's convenience.

19 This stipulation is entered into for the following reasons:

- 20 1. Government counsel requires additional time to prepare a Response to Defendant's  
21 Motion to Suppress.
- 22 2. The Defendant is in custody and defense counsel does not object to the continuance.
- 23 3. For the reasons stated above, the ends of justice would best be served by a continuance of  
24 the deadline.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(3)(A) and (h)(7)(A), considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and (h)(7)(B)(iv).

6. This is the first request for a continuance filed herein.

DATED this 11th day of June, 2015.

DANIEL G. BOGDEN  
United States Attorney

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*/s/ Rachel Korenblat*  
Rachel Korenblat, AFD  
Counsel for Defendant Robert Brown

/s/ Alexandra Michael  
ALEXANDRA MICHAEL  
Assistant United States Attorney

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2                   **UNITED STATES DISTRICT COURT**  
3                   **DISTRICT OF NEVADA**

4                   **-oOo-**

5                   UNITED STATES OF AMERICA,

6                   Plaintiff,

7                   vs.

8                   ROBERT BROWN,

9                   Defendant.

10                  2:15-cr-00053-LRH-VCF

11                  FINDINGS OF FACT, CONCLUSIONS  
12                  OF LAW, AND ORDER

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**FINDINGS OF FACT**

14                  Based upon the pending Stipulation of counsel, and good cause appearing therefore, the  
15                  Court finds that:

- 16                  1. Government counsel requires additional time to prepare a Response to Defendant's  
17                  Motion to Suppress.
- 18                  2. The Defendant is in custody and defense counsel does not object to the continuance.
- 19                  3. For the reasons stated above, the ends of justice would best be served by a continuance of  
20                  the deadline.
- 21                  4. Additionally, denial of this request for continuance could result in a miscarriage of  
22                  justice.
- 23                  5. The additional time requested by this Stipulation is excludable in computing the time  
24                  within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,  
United States Code, Sections 3161(h)(3)(A) and (h)(7)(A), considering the factors under Title 18,  
United States Code, Sections 3161(h)(7)(B)(i) and (h)(7)(B)(iv).

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**CONCLUSIONS OF LAW**

26                  The ends of justice served by granting said continuance outweigh the best interest of the  
27                  public and the Defendant in a speedy trial, since the failure to grant said continuance would be likely

1 to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity  
2 within which to be able to effectively and thoroughly prepare for trial, taking into account the  
3 exercise of due diligence.

4 The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United  
5 States Code, Sections 3161(h)(1)(A), (h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv).

6 **ORDER**

7 IT IS THEREFORE ORDERED that the deadline for Government's Response to  
8 Defendant's Motion to Suppress, currently scheduled for June 17, 2015, be vacated and continued  
9 to the 24th day of June, 2015.

10 DATED this 11th day of June, 2015.

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13 HONORABLE CAM FERENBACH  
14 UNITED STATES MAGISTRATE JUDGE  
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